

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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VAUGHN SCOTT, NIGERIA SCOTT,
PRINCE SCOTT, ANDREE HARRIS,
BRENDA SCOTT, KRAIG UTLEY, COREY MARROW,
AS A MINOR CHILD, K.M., A MINOR CHILD,
AND JULIAN RENE,

Plaintiffs,

-against-

14-CV-4441 (SHS)

CITY OF MOUNT VERNON, ET AL.,

Defendants.

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HELD AT: Office of Corporation Counsel
1 Roosevelt Square
Mount Vernon, New York 10550
December 1, 2015
1:23 p.m.

Examination before Trial of the
Plaintiff, BRENDA SCOTT, pursuant to Court
Order, held at the above time and place
before a Notary Public of the State of New
York.

J & L REPORTING SERVICE
of Westchester, Inc.
50 Main Street, Suite 1000
White Plains, New York 10606
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Lisa Dobbo, Reporter

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Of Counsel

1 B. SCOTT 5

2 correct?

3 A. Yes.

4 Q. That relates to March 20th,
5 2013?

6 A. Yes.

7 Q. Why?

8 A. Because they went against my
9 rights.

10 Q. They meaning the police
11 department?

12 A. Yes.

13 Q. What did they do to you on
14 March 20th, 2013?

15 MR. THOMPSON: Objection to
16 form.

17 Q. Did the Mount Vernon police
18 officers do anything to you on March 20th,
19 2013 to cause you to file a civil rights
20 lawsuit?

21 MR. THOMPSON: Objection to
22 form but you can answer.

23 A. One thing they insulted me,
24 number one, and slammed the door on my foot.

25 Q. Anything else?

2 A. I don't think so.

3 Q. You say they insulted you.

4 Do you know which officer insulted
5 you?

6 A. The first one that came to the
7 door. I don't know his name.

8 Q. The officers that you saw on
9 March 20th, 2013, had you seen any of those
10 officers before March 20th, 2013?

11 A. Yes.

12 Q. Which officers?

13 A. I seen most of them in the
14 street; Antonini, I think it was the last
15 one you -- I seen them in the street, just
16 the faces. I don't know the names of all of
17 them.

18 Q. Other than seeing them in the
19 street before March 20th, did you have any
20 encounters with any of those officers?

21 A. No.

22 Q. Have you ever been arrested
23 before?

24 A. Once in my life.

25 Q. When was that, if you can

B. SCOTT

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2 video games in the back, the teenagers, they
3 were playing video games and I was getting
4 ready to cook and everybody else was
5 watching television.

6 Q. How did the police officers get
7 into your apartment?

10 Q. Who answered the door?

11 A. I did.

12 Q. What did the police officers
13 say to you?

19 Q. Did you say anything else to
20 the police officers?

21 | A. I asked him did they have a
22 | warrant.

23 Q. And they answered what?

24 A. They said we don't need a
25 warrant.

2 door when they entered the apartment?

8 Q. Did the police officers injure
9 you?

13 Q. Did you find out why the police
14 officers were in your apartment?

18 Q. They informed you that there
19 was a shooting before they came to your
20 apartment?

21 A. Yes.

22 Q. And did they tell you anything
23 else, if you can recall, regarding that
24 shooting?

25 A. Only that they wanted to speak

B. SCOTT

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A. No.

Q. What else did you observe after
aw the police officers searching
in areas in your home on 3-20-13?

MR. THOMPSON: Objection to

form but you can answer.

11 Q. Did the police officers do
12 anything else other than take ID's?

Q. Did they touch anybody?

18 MR. THOMPSON: You have to
19 answer in words.

20 A. Yes.

21 Q. Who did they -- who did you see
22 them touch?

2 MR. THOMPSON: I think the
3 question was how long were they
4 actually there.

5 A. I really don't know. I don't
6 remember how many hours but it was hours.
7 That's all I can say is that it was hours.

8 Q. What did they say to you during
9 that time?

10 A. They made jokes and stuff like
11 that.

12 Q. They didn't physically harm
13 you?

14 A. No, not speaking to me, no.

15 Q. Corey Marrow was in the house,
16 as well?

17 A. Uh-huh.

18 Q. What was he doing at this time
19 while the police were inside? 44

20 A. He was waiting for the baby to
21 come home, for the baby's mother to bring
22 her home.

23 Q. Let's get back to Julian Rene.

24 You know now that he had been shot
25 and I believe it was in the buttocks and you

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B. SCOTT

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2 police officers after March 20th, 2013?

3 A. I haven't personally.

4 Q. Are you seeing any medical
5 professionals; psychiatrist or any other
6 person regarding your fear of walking down
7 the streets?

15 Q. When did you first go to this
16 medical person in New Rochelle, what year
17 was that?

18 A. A couple years.

19 Q. You don't recall what year?

20 A. No.

21 Q. How often had you gone there?

22 A. I used to go every Saturday
23 morning.

24 Q. Why were you attending these
25 sessions, if you will, every Saturday

2 television.

3 Q. How old is Andree?

4 A. 32.

5 Q. To your knowledge, has Andree
6 Harris ever been arrested?

7 A. One time when was 15 almost 16.

8 Q. Do you know what for?

9 A. He was rolling a cigarette in
10 front of the building.

11 Q. 328?

12 A. No.

13 Q. What building?

14 A. 10th Avenue.

15 Q. Did you see anybody get injured
16 during the time you were inside the
17 apartment at 328 S. 2nd Avenue?

18 A. No, I didn't see anything.

19 Q. Other than the bathroom sink, I
20 think you mentioned, did you see any other
21 damage to any property in that apartment?

22 A. No, I didn't see any damage to
23 any other property.

24 Q. Did you file a complaint
25 against any police officers as a result of

2 the March 20th, 2013 incident other than a
3 Notice of Claim?

4 MR. THOMPSON: Objection to
5 form.

6 THE WITNESS: I don't
7 understand.

8 Q. Did you file a complaint, a
9 civilian complaint?

10 A. No.

11 Q. Did you fill out any reports
12 regarding this incident at the Mount Vernon
13 Police Department --

14 A. No.

15 Q. -- on March 20th, 2013?

16 A. No.

17 Q. Other than your fear of walking
18 down the streets of Mount Vernon, are there
19 any other emotional injuries that you have
20 sustained as a result of the 3-20-13
21 incident?

22 THE WITNESS: Emotional?

23 MR. WISHAM: Yes.

24 A. No.

25 Q. You said there were about 12